

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

ALONZO AUSTIN,)	
)	Case Number:
Plaintiff)	
)	3:07-CV-042-MEF
v.)	
)	
GLOBAL CONNECTION,)	
)	
Defendant)	

ANSWER AND DEFENSES OF DEFENDANT GLOBAL CONNECTION

COMES NOW Defendant Global Connection and files this its Answer and shows as follows:

FIRST DEFENSE

Plaintiff has failed to state a claim for which relief may be granted.

SECOND DEFENSE

Plaintiff has accepted payment for his alleged damages from the Defendant reaching an accord and satisfaction with regard to the claims of his Complaint.

1.

Defendant admits this Court has jurisdiction over the claims alleged in Plaintiff's Complaint. To the extent the first unenumerated paragraph of Plaintiff's Complaint contains allegations other than claiming this Court has subject matter jurisdiction over this matter, such claims are expressly denied.

2.

Defendant is without sufficient knowledge to admit or deny the allegations contained in the first enumerated paragraph of Plaintiff's Complaint. To the extent a response is required to said allegations, they are expressly denied.

3.

Defendants admit the allegations contained in Paragraph 2 of Plaintiff's Complaint.

4.

Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph 3 of Plaintiff's Complaint. To the extent a response is required to said allegations, they are expressly denied.

5.

Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph 4 of Plaintiff's Complaint. To the extent a response is required to said allegations, they are expressly denied.

6.

Defendant denies the allegations contained in Paragraph 5 of Plaintiff's Complaint.

7.

Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph 6 of Plaintiff's Complaint. To the extent a response is required to said allegations, they are expressly denied.

8.

Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph 7 of Plaintiff's Complaint. To the extent a response is required to said allegations, they are expressly denied.

9.

Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph 8 of Plaintiff's Complaint. To the extent a response is required to said allegations, they are expressly denied.

10.

Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph 9 of Plaintiff's Complaint. To the extent a response is required to said allegations, they are expressly denied.

11.

Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph 10 of Plaintiff's Complaint. To the extent a response is required to said allegations, they are expressly denied.

COUNT ONE

Defendant denies the allegations contained in Count One of Plaintiff's Complaint and reincorporates its responses to Paragraphs 1 through 4 of Plaintiff's Complaint as set out in Paragraphs 2 through 5 of Defendant's Answer.

COUNT TWO

Defendant denies the allegations contained in Count Two of Plaintiff's Complaint and reincorporates its responses to Paragraphs 1 through 9 of Plaintiff's Complaint as set out in Paragraphs 2 through 10 of Defendant's Answer.

COUNT THREE

Defendant denies the allegations contained in Count Three of Plaintiff's Complaint and reincorporates its responses to Paragraphs 1 through 10 of Plaintiff's Complaint as set out in Paragraphs 2 through 11 of Defendant's Answer.

WHEREFORE, premises considered, the Defendants pray for the following relief:

- (a) That an Order issue denying all of Plaintiff's claims;
- (b) That all costs of this action be taxed to the Plaintiff; and
- (c) Such other and further relief as this Court deems just and equitable under the circumstances.

This 7th day of February, 2007.

MCKOON, THOMAS & MCKOON

/s/Joshua R. McKoon

By: _____

Joshua R. McKoon
State Bar No. MCK057

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Phenix City, Alabama 36868-3220
334.297.2300
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Counsel for Defendant

CERTIFICATE OF SERVICE

Counsel for the Defendant has this day served the foregoing Answer on the Plaintiff via First Class Mail at the following address:

Alonzo Austin
1321 Oliver Carus Road
Tuskegee, Alabama 36083

This 7th day of February, 2007.

/s/Joshua R. McKoon

Counsel for Defendant